

REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 3-11, 13-28, and 30-40 are presently active in this case, Claims 1, 3, 11, 13, 21, 28, and 36 having been amended, Claims 2, 12, and 29 having been canceled without prejudice or disclaimer, and Claims 37-40 having been added by way of the present Amendment.

In the outstanding Official Action, Claims 1-36 were rejected under 35 U.S.C. 102(e) as being anticipated by Levi (U.S. Patent No. 6,636,983). For the reasons discussed below, the Applicant requests the withdrawal of the anticipatory rejection.

In the Office Action, the Levi reference is indicated as anticipating each of Claims 1-36. However, the Applicant notes that a claim is anticipated only if each and every element as set forth in the claims is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As will be demonstrated below, the Levi reference clearly does not meet each and every limitation of the independent Claims 1, 11, 21, and 28.

As noted in the Abstract, the Levi reference describes a system in which a user contracts for service with an operations center (12) in order to provide monitoring and tracking services for a plurality of devices (30). After contracting for service, the operations center provides an agent (81) for download by a user to one or more of the user's devices (14, 16, 18, 20, 22, 630) for which the user has contracted for service. The agent is installed on

the devices associated with the user's sites and communicates with the operations center. An exception sentinel (748) monitors Uniform Resource Locators associated with a web site associated with the user. A listening process (710) at the operations center listens for periodically sent beacon packets (640) generated by a monitored device (630). Using location indicators included with the beacon packets and generated by an agent (681) on the monitored device, the operations center provides notifications (712) to a handler regarding the location of the monitored device if the monitored device is reported as stolen. A tracking response (714) may be communicated to the monitored device to take special actions when the device is stolen and to update the agent and other portions of the monitored device.

Claim 1 of the present application recites a peripheral device configured to be connected to a plurality of peripheral devices via a network, the peripheral device comprising means for managing the plurality of peripheral devices, and means provided in the peripheral device for selecting one peripheral device out of the peripheral devices to manage the peripheral devices. The Applicant submits that the Levi reference does not disclose a peripheral device that includes in the peripheral device a means for selecting one peripheral device out of the peripheral devices to manage the peripheral devices. The Levi reference describes numerous devices (14, 16, 18, 20, 22, 630). The Official Action cites column 14, lines 56-61, of the Levi reference for the teaching of a means for selecting, however, this portion of the Levi reference describes actions taken by a site administrator (140), which is typically the user as stated in column 6, lines 32-34. The Levi reference does not describe any type of means that is provided in a peripheral device for selecting one peripheral device

to manage a plurality of peripheral devices. Figure 14 depicts a configuration in which a device (630) is used to monitor other devices. However, the Levi reference does not describe any of the devices as having *means provided in the device for selecting one peripheral device* to manage a plurality of peripheral devices. Accordingly, the Applicant submits that the Levi reference does not teach all of the limitations recited in Claim 1, and thus Claim 1 is allowable over the cited reference.

Claims 3-10 are considered allowable for the reasons advanced for Claim 1 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed nor suggested by the applied references when those features are considered within the context of Claim 1.

Claim 11 recites a system comprising a plurality of peripheral devices connected to a network, wherein each peripheral device of the plurality of peripheral devices comprises means for managing the plurality of peripheral devices, and means provided in each peripheral device for selecting one peripheral device out of the peripheral devices to manage the plurality of peripheral devices. The same arguments that are set forth above with respect to Claim 1 also apply to Claim 11. Accordingly, the Applicant submits that the Levi reference does not teach all of the limitations recited in Claim 11, and thus Claim 11 is allowable over the cited reference.

Claims 13-20 are considered allowable for the reasons advanced for Claim 11 from which they depend. These claims are further considered allowable as they recite other

features of the invention that are neither disclosed nor suggested by the applied references when those features are considered within the context of Claim 11.

Claim 21 recites a method for managing a plurality of peripheral devices connected to a network, comprising, among other steps, the steps of using a peripheral device of the plurality of peripheral devices to select one peripheral device out of the plurality of peripheral devices to manage the peripheral devices, and managing the plurality of peripheral devices from the one peripheral device. The Applicant submits that the Levi reference does not disclose a step of using a peripheral device to select one peripheral device out of the peripheral devices to manage the peripheral devices. The Official Action cites column 14, lines 56-61, of the Levi reference for the teaching of selecting a peripheral device, however, this portion of the Levi reference describes actions taken by a site administrator (140), which is typically the user as stated in column 6, lines 32-34. The Levi reference does not describe using a peripheral device to make the selection. Accordingly, the Applicant submits that the Levi reference does not teach all of the limitations recited in Claim 21, and thus Claim 21 is allowable over the cited reference.

Claims 22-27 are considered allowable for the reasons advanced for Claim 21 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed nor suggested by the applied references when those features are considered within the context of Claim 21.

Claim 28 recites a computer program product, comprising a computer storage medium and a computer program code mechanism embedded in the computer storage medium for

causing a peripheral device to manage a plurality of peripheral devices connected to a network, the computer program code mechanism comprising a first computer code device configured to manage the plurality of peripheral devices from one peripheral device, and a second computer code device configured to select the one peripheral device out of the peripheral devices to manage the peripheral devices. The Applicant submits that the Levi reference does not disclose a computer code device configured to select one peripheral device out of the peripheral devices to manage the peripheral devices. The Official Action generally cites Figure 1 for the teaching of such a computer code device with no explanation of which feature in Figure is being referred to for the teaching of the computer code device. As noted above, column 14, lines 56-61, of the Levi reference describes actions taken by a site administrator (140), which is typically the user as stated in column 6, lines 32-34. The Levi reference does not describe a computer code device configured to make the selection. Accordingly, the Applicant submits that the Levi reference does not teach all of the limitations recited in Claim 28, and thus Claim 28 is allowable over the cited reference.

Claims 30-36 are considered allowable for the reasons advanced for Claim 28 from which they depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed nor suggested by the applied references when those features are considered within the context of Claim 28.

Newly added Claims 37-40 are considered allowable as they recite features of the invention that are neither disclosed nor suggested by the references of record. Support for these claims can be found throughout the specification, for example on page 4, lines 1-4. The

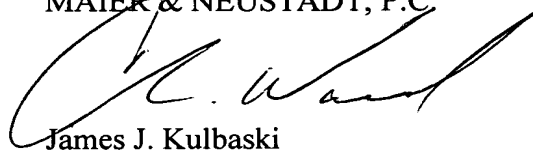
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new claims are allowable for at least the reasons stated above with respect to the independent claims from which they depend. Accordingly, the Applicant submits that the new claims are allowable over the cited art.

Consequently, in view of the above discussion, it is respectfully submitted that the present application is in condition for formal allowance and an early and favorable reconsideration of this application is therefore requested.

Respectfully Submitted,

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